

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE, TENNESSEE

CASE NO.: 2:20-cv-00030

JOHNSON CITY ENERGY AUTHORITY,
D/B/A BRIGHTRIDGE,

Plaintiff and Counter-Defendant,

vs.

UNITED TELEPHONE SOUTHEAST, LLC,
D/B/A CENTURYLINK,

Defendant and Counter-Plaintiff.

DEPOSITION OF

ANDREW CHONG

Pages 1 through 195

Thursday, December 1, 2022
9:28 a.m. - 3:21 p.m.

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
200 South Orange Avenue, Suite 2900
Orlando, Florida 32801

Stenographically Reported By:
Alison Hawk, RPR

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1 Citrus Avenue, Winter Park, Florida.

2 Q What was the title of the job that you
3 began performing in 2018?

4 A Joint use manager.

5 Q Was that a newly created position?

6 A No.

7 Q Did you replace someone?

8 A Yes.

9 Q Who did you replace?

10 A Mr. Henry Bowlin, B-O-W-L-I-N.

11 Q And was Henry Bowlin's title the joint use
12 manager?

13 A As far as I know, yes.

14 Q What was the circumstance that resulted in
15 Henry Bowlin no longer performing the job so that it
16 was available to you?

17 A He retired.

18 Q How long had Henry Bowlin been the joint
19 use manager?

20 A I have no idea.

21 Q Do you know if it was long term?

22 A I assume, yes.

23 Q Do you know if someone performed the job
24 of joint use manager before Harry Bowlin (sic)?

25 A I don't know. It's not Harry, it's Henry.

CERTIFICATE OF OATH

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STATE OF FLORIDA
COUNTY OF ORANGE

I, the undersigned authority, certify that
ANDREW CHONG remotely appeared before me and
was duly sworn on the 1st day of December,
2022.

Signed this 15th day of December, 2022.

Alison Hawk

ALISON HAWK, RPR
Notary Public, State of Florida
My Commission No. HH 252987
Expires: 04/22/2026

